

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) MASON MECKLENBURG,

Plaintiff,

v.

Case No. CIV-22-089-G

**(1) KINGFISHER INDEPENDENT
SCHOOL DISTRICT NO. 7 OF
KINGFISHER COUNTY,
OKLAHOMA, a/k/a KINGFISHER
SCHOOL DISTRICT, a/k/a
KINGFISHER PUBLIC SCHOOLS;**

(2) JEFF MYERS, individually;

(3) MICAH NALL, individually;

**(4) DEREK PATTERSON, individually;
and;**

(5) BLAKE EATON, individually,

Defendants.

**DEFENDANTS KINGFISHER PUBLIC SCHOOLS, PATTERSON,
AND EATON'S PRELIMINARY WITNESS AND EXHIBIT LIST**

No.	Name	Contact
1.	Dr. Daniel Craig	% Rosenstein, Fist & Ringold
2.	Jay Wood	% Rosenstein, Fist & Ringold
3.	Dana Golbek	% Rosenstein, Fist & Ringold
4.	Terry Payne	% Rosenstein, Fist & Ringold
5.	James Perdue	% Rosenstein, Fist & Ringold
6.	Jason Sternberger	% Rosenstein, Fist & Ringold
7.	Don Scales	% Rosenstein, Fist & Ringold
8.	Craig Patterson	% Rosenstein, Fist & Ringold
9.	Todd Overstreet	% Rosenstein, Fist & Ringold
10.	Micah Nall	% Mark Rains
11.	Chris Wilfong	% Rosenstein, Fist & Ringold
12.	Charles Walker	% Rosenstein, Fist & Ringold

13.	Carly Franks	% Rosenstein, Fist & Ringold
14.	Stuart Purinton	% Rosenstein, Fist & Ringold
15.	Jared Reese	% Rosenstein, Fist & Ringold
16.	Chris Roberts	Atlanta, GA
17.	Wade Sunby	405/503-6233
18.	Kerry Lafferty	% Rosenstein, Fist & Ringold
19.	Mark Snodgrass	Kingfisher, OK 405/590-7926
20.	Justin Stephenson	Kingfisher, OK 580/216-4272
21.	Cade Stephenson	Kingfisher, OK 580/216-6616
22.	Dustin Isom	405/230-0502
23.	Rachel Cameron	Kingfisher, OK 405/368-5460
24.	Jarrett Birdwell	Kingfisher, OK 405/368-0902
25.	Bijan Cortez	Kingfisher, OK 405/538-8386
26.	Caleb Dick	Kingfisher, OK 405/231-1235
27.	Harrison Evans	Kingfisher, OK 214/477-2886
28.	Reese Lafferty	Kingfisher, OK 405/538-7089
29.	Troy Haub	Kingfisher, OK
30.	Trey Green	Shawnee, OK
31.	Cole Cameron	Pennsylvania 405/368-4071
32.	Angie Kennedy	Kingfisher, OK 405/368-0861
33.	Riley Myers	% White & Weddle
34.	Abbie Myers	% White & Weddle
35.	Berto Padilla	405/699-2501
36.	Zoe Evans	Kingfisher, OK 214/557-1643
37.	Ally Stephenson	Kingfisher, OK 580/216-5634
38.	Keith Campbell	Balco, OK 405/368-0688
39.	Morgan Winters	Kingfisher, OK 405/368-4884
40.	Jett Sternberger	Kingfisher, OK
41.	Jeff Myers	% White & Weddle
42.	Blake Eaton	% Rosenstein, Fist & Ringold
43.	Derek Patterson	% Rosenstein, Fist & Ringold
44.	Mason Mecklenburg	% Plaintiff's counsel
45.	Justin Mecklenburg	% Plaintiff's counsel
46.	Lyndy Mecklenburg	% Plaintiff's counsel
47.	Linda Mecklenburg	% Plaintiff's counsel
48.	Dr. Shawn Roberson	% Rosenstein, Fist & Ringold
49.	Lance Watson	% Rosenstein, Fist & Ringold
50.	Hunter Barton	405/368-6162
51.	Jarrold Barton	405/202-9629
52.	Kyle Borelli	Kingfisher, OK 405/368-4871
53.	Brandt Franks	405/368-2626

54.	Cole Crosswhite	Kingfisher, OK
55.	Cade Covalt	Kingfisher, OK 405/509-4091
56.	Cooper Covalt	Kingfisher, OK 405/761-8205
57.	Gonzalo Delatorre	405/473-4090
58.	Kyle Fahlenkamp, Jr.	Kingfisher, OK 405/388-6535
59.	Stan Blundell	% Rosenstein, Fist & Ringold
60.	Cody Evans	214/557-1643
61.	Danny Green	% Rosenstein, Fist & Ringold
62.	Tracy Stephenson	Kingfisher, OK 580/216-5634
63.	Kevin Velardez	Unknown
64.	Steven Wilson	Cashion, OK 405/517-0949
65.	Colton York	Unknown; 405/699-2109

- 66. Parents and trainers 2005, through date of trial
- 67. All Coaches 2005 through present, if not otherwise listed.
- 68. All witnesses identified by all other parties to whom these Defendants do not object.
- 69. Discovery is ongoing and these Defendants reserve the right to supplement this list.

No.	Exhibit
1.	GCN Interactive Training (Kingfisher SD 1477-1567)
2.	Kingfisher Board of Education policies
3.	Kingfisher High School Handbook (Kingfisher SD 19-240)
4.	Kingfisher Pub. Sch. Teachers Association Agreement (Kingfisher SD 241-262)
5.	Reports of wrongdoing within Kingfisher football program (Kingfisher SD 263-305)
6.	Jeff Myers employment file (Kingfisher SD 306-437)
7.	Micah Nall employment file (Kingfisher SD 438-516)
8.	Kingfisher Pub. Sch. investigation into allegations against Nall (Kingfisher SD 277-305)
9.	Derek Patterson employment file (Kingfisher SD 517-584)
10.	Blake Eaton employment file (Kingfisher SD 585-602)
11.	Safe School Helpline documents (Kingfisher SD 603-604)
12.	Mason Mecklenburg's school file (Kingfisher SD 605-642)
13.	Mason Mecklenburg medical records (Kingfisher SD 643-775; McBride Ortho 1-45)
14.	Organizational chart of Kingfisher Pub. Sch. (Kingfisher SD 1)
15.	Organization charge of Kingfisher athletic department (Kingfisher SD 2)
16.	Kingfisher Pub. Sch. Board minutes (Kingfisher SD 776-941)
17.	Kingfisher BOE policies on sexual harassment, discrimination, hazing, and bullying (Kingfisher SD 5-17)

18.	Mason Mecklenburg's college records (OSU 1-41)
19.	District training materials on bullying/harassment (Kingfisher SD 942-1285)
20.	Records of training (Kingfisher SD 1286-1476)
21.	Investigation of complaint (Kingfisher SD 390-414)
22.	Investigation of claim (Kingfisher SD 380-381)
23.	Investigation of claim (Kingfisher SD 431-435)
24.	Investigation of Plaintiff's claim. (Board Members 42-111)
25.	Law enforcement records/reports related to Plaintiff
26.	Law enforcement interviews/recordings
27.	Justin Mecklenburg notes from meeting with Myers (JDOEKF37-41)
28.	Report from Lance Watson (produced)

28. All exhibits identified by all other parties to which these Defendants do not object.
 29. Discovery is ongoing and these Defendants reserve the right to supplement this list.

Respectfully submitted,

s/Eric D. Janzen

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ATTORNEYS FOR DEFENDANT,
 KINGFISHER PUBLIC SCHOOLS,
 BLAKE EATON, AND DEREK PATTERSON

CERTIFICATE OF SERVICE

☒ I hereby certify that on June 20, 2023, I electronically transmitted the attached document to the Clerk of Court using the Electronic Case Filing System for filing. Based on the records currently on file in this case, the Clerk of Court will transmit a Notice of Electronic Filing to those registered participants of the ECF System.

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☐ I hereby certify that on _____, I filed the attached document with the Clerk of the Court and served the attached document by _____ on the following, who are not registered participants of the ECF System:

s/Eric D. Janzen
ERIC D. JANZEN